

**Via ECF**

The Honorable Cathy Seibel  
United States District Judge  
United States District Court  
300 Quarropas Street  
White Plains, NY 10601-4150

**RE: *United States of America ex rel. Integra Med Analytics LLC. v. Isaac Laufer, et al.*, No. 7:17 Civ. 9424-CS**

Dear Judge Seibel:

Pursuant to this Court's Individual Practice Rule 1(E), Defendants respectfully request a seven-day extension of the deadline for filing Defendants' motions to dismiss in this case. As explained in more detail below, the 11 facility defendants intend to coordinate and consolidate their arguments into a single brief and request the Court increase the page limit to 33 pages for their memorandum in support of their motion to dismiss.

There are 14 defendants in this case. 11 of the defendants are skilled nursing facilities, two are individual persons, and one is a third party service company. Defendants are preparing motions to dismiss and accompanying memoranda of law. The 11 facility defendants wish to coordinate and consolidate their arguments into a single memorandum of law in support of their motions to dismiss. Defendants request that the current deadline for the motions to dismiss of October 21, 2021 be extended to October 28, 2021, to afford the 11 facility defendants the time to coordinate and consolidate their arguments into a single brief and to make the deadline for the other three defendants co-extensive with the deadline for the 11 facility defendants. The 11 facility defendants further request that the Court increase the page limit for their consolidated memorandum to 33 pages—three pages per defendant—so that they can address all of the arguments that would otherwise be addressed in separate briefs.

There have been no previous requests for extension in this case. Undersigned counsel has conferred with counsel for the Government and the Government takes no position on the appropriate number of briefs in this case but consents to the request for extension of time and the increase in the page limit for the consolidated memorandum of the 11 facility defendants. The Defendants ask that all other current deadlines for briefing the motions to dismiss also be extended by seven days so that the Government's opposition would be due December 9, 2021, and the Defendants' replies due December 23, 2021. The Government has asked to reserve its right to seek an extension of time to file its opposition to Defendants' motions to dismiss and request additional pages for its brief(s), if needed.

Sincerely,

/s/ J. Bradley Robertson

**DRAFT – PRIVILEGED AND CONFIDENTIAL  
SUBJECT TO JOINT DEFENSE AGREEMENT**

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